



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

July 3, 2022

BY ECF

Hon. Valerie E. Caproni
Thurgood Marshall
United States Courthouse
40 Foley Square, Courtroom 443
New York, NY 10007

**Re: *United States v. Williams, et al.* S3 21 Cr. 603 (VEC)
 United States v. Chavez, S4 21 Cr. 603 (VEC)**

Dear Judge Caproni:

The Government writes pursuant to the Court's order, to provide a status report regarding the Government's production of discovery in the above-captioned matters.

Since the Government's last status report on June 3, 2022, the Government has made productions to the defendants on June 9, 2022, June 10, 2022, June 24, 2022, June 28, 2022, and June 30, 2022. Individual productions to defendants Dooling, Wahab, Williams, and Chavez were also made.

On June 3, 2022, the Government reported to the Court that the following categories of materials had not yet been produced: (i) certain pen register data for defendants Wahab, Washington, and Dooling; (ii) subpoena returns received after June 3, 2022; (iii) the remaining responsive materials from the Plan and Third-party Administrators ("TPAs"); (iv) a remaining set of responsive documents from seven email accounts searched pursuant to search warrants; (v) responsive documents from two additional email accounts searched pursuant to search warrants, which as of June 3, 2022, had not yet been reviewed; (vi) responsive material from the cellphone seized from defendant Dooling on the day of his arrest; (vii) responsive material from a recently unlocked cellphone seized from defendant Williams on the day of his arrest; (viii) certain responsive material from three cellphones and computing devices seized from defendant Wahab's home and business; and (ix) FBI 302s reporting defendant Chavez's arrest.

The Government can report that production of the foregoing materials was completed on June 30, 2022. Accordingly, the Government believes it has substantially completed its production of Rule 16 materials to the defendants.

The Government notes, however, that it may produce additional materials to the defendants. The Government's investigation remains ongoing, and to the extent the Government obtains additional materials that are relevant to the defendants, it will disclose them on a rolling basis. The Government will also continue to review its files, and to the extent material that the

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Government possesses should be disclosed, the Government will do so. Indeed, it is possible that some confirmatory searches in the Government's document databases will lead the Government to produce a small number of additional documents in the coming weeks. Certain FBI 302s or other reports, which have not yet been completed, may also be produced. With respect to devices that the Government has seized, FBI's CART team intends to continue efforts to bypass the security features in two of the cellphones seized from defendant Williams. If those efforts prove successful, additional materials may need to be produced. Similarly, CART has so far been unable to convert into readable format certain files in computing devices seized from defendant Wahab. Efforts to convert those files remain ongoing and, if successful, additional productions may be warranted. The Government has prepared, but has not yet provided, an additional individual production to defendant Wahab. That production will be made once the Government receives a hard drive from his counsel. Finally, the Government notes that it is working with Ms. Greenwood and her staff to resolve questions and issues regarding certain documents previously produced by the Government. Resolving those issues may necessitate re-production of certain documents or production of additional materials.

In sum, to date, the Government has produced a total of approximately 306 gigabytes of uncompressed data (approximately 42,409 files and more than 610,180 pages) to the defendants.

The Government is available to address any questions the Court may have.

Respectfully submitted,

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